

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO

ENCORE RECEIVABLE	)	CASE NO: 1:12-CV-297
MANAGEMENT, INC., et al.,	)	
	)	JUDGE HERMAN J. WEBER
Plaintiffs,	)	
	)	<b><u>STIPULATED LEAVE TO PLEAD</u></b>
v.	)	
	)	
ACE PROPERTY AND CASUALTY	)	
INSURANCE CO., et al.,	)	
	)	
Defendants.	)	

Counsel for Plaintiffs Encore Receivable Management, Inc. and Convergys Customer Management Group and Defendant American Guarantee Insurance Company ("AGIC") do hereby stipulate that AGIC shall have up to and including May 25, 2012 in which to move, plead or otherwise answer Plaintiffs' Complaint. No previous extensions have been granted.

Respectfully submitted,

/s/ James E. Arnold  
*Per email consent (5/1/12)*  
JAMES E. ARNOLD  
MATTHEW J. BURKHART  
James E. Arnold & Associates Co., LPA  
115 West Main Street  
4<sup>th</sup> Floor  
Columbus, Ohio 43215  
Phone: 614-460-1600  
Fax: 614-469-1066  
Email: [jarnold@arnlaw.com](mailto:jarnold@arnlaw.com)

*Attorneys for Plaintiffs*

/s/ Crystal L. Maluchnik  
STEVEN G. JANIK (0021934)  
CRYSTAL L. MALUCHNIK (0077875)  
JANIK L.L.P.  
9200 South Hills Boulevard, Suite 300  
Cleveland, Ohio 44147-3521  
Phone: 440-838-7600  
Fax: 440-838-7601  
Email: [Steven.Janik@Janiklaw.com](mailto:Steven.Janik@Janiklaw.com)  
[Crystal.Maluchnik@Janiklaw.com](mailto:Crystal.Maluchnik@Janiklaw.com)

*Attorneys for American Guarantee Insurance Company*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was filed electronically this 1<sup>st</sup> day of May, 2012. Notice of this filing will be sent to Parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Crystal L. Maluchnik

*One of the Attorneys for Defendant American  
Guarantee Insurance Company*